

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:  
Frank R. Skrajny : Case No.19-20606 JAD  
Janet E. Owad-Skrajny : Chapter 13  
Debtor(s)  
Janet E. Owad-Skrajny :  
Movant(s) : Related to Document #37  
vs. :  
Amazon, America Express, Amex, :  
Bank of America, Capital One, Cavalry :  
Investments, Chasse Bank, Citi, :  
Comenity Bank, Costco, Navient, :  
Duquesne Light, Embrace Loans, King :  
Size, Kohls, LVNV Funding, Merrick :  
Bank, Nissan Motor Acceptance, One :  
Main Financial, PNC Bank, PRA :  
Receivables, PA Dept. of Revenue, :  
Peoples Natural Gas, Quantum3 Group,:  
Roundpoint Mortgage, Sears, Synchrony: :  
Bank, TD Bank, Target, and Ronda J :  
Winnecour, Trustee :  
Respondent(s) :

TRUSTEE'S RESPONSE TO APPLICATION FOR APPROVAL TO ALLOW  
DEBTOR TO OBTAIN CREDIT CARD FOR WORK-RELATED TRAVEL  
EXPENSES

Ronda J. Winnecour, Chapter 13 Trustee, by her undersigned counsel,  
respectfully represents the following:

1. The Debtors request approval to obtain a credit card for work-related travel expenses.
2. The Trustee objects on the basis that the use of credit cards was at least a contributing cause of the filing of her bankruptcy case. The amount of credit card debt listed in the Debtors' Schedules totals \$80,010.30.
3. If the Debtors' Motion is granted, the Trustee requests that they be required to file monthly reports setting out the monthly charges, the monthly payments on

the credit card, the reimbursement checks from Debtor's employer, and whether there are any unreimbursed charges on the credit card.

WHEREFORE, the Trustee respectfully requests that the Motion be denied.

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE

Date: 05/14/19

by /s/ Jana S. Pail  
Jana S. Pail - PA I.D. #88910  
Attorney for Trustee  
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600 Grant St.  
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Winnecour, Trustee :  
Respondent(s) :

CERTIFICATE OF SERVICE

I hereby certify that on the 14<sup>TH</sup> of May 2019, I served one true and correct copy of the foregoing document on the following parties in interest by United States first-class mail, postage prepaid, addressed as follows:

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Suite 970, Liberty Center  
1001 Liberty Avenue  
Pittsburgh PA. 15222

Frank Skrajny  
Janet E. Owad-Skrajny  
1108 Queens Mill Road  
Aliquippa PA 15001

Lauren M. Lamb, Esquire  
Steidl & Steinberg  
707 Grant Street  
28<sup>th</sup> Floor – Gulf Tower  
Pittsburgh PA 15219

/s/Dianne DeFoer  
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